

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ALLSTATE INSURANCE COMPANY and	)	
ALLSTATE LIFE INSURANCE COMPANY,	)	No. 17-CV-05826
	)	
Plaintiffs,	)	
	)	Hon. Steven C. Seeger
v.	)	
	)	
AMERIPRISE FINANCIAL SERVICES, INC.,	)	
	)	
Defendant.	)	
	)	

**DEFENDANT'S APPENDIX OF EXHIBITS**  
**IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT**

John T. Sullivan, an attorney for Defendant Ameriprise Financial Services, Inc.<sup>1</sup> ("Ameriprise Financial"), hereby certifies that the following documents represent true and correct copies of the deposition testimony and exhibits, declarations, and written discovery submitted in the above-captioned case:

- Exhibit 1: Excerpt of relevant pages from the Ameriprise Financial, Inc. Form 10-K for the fiscal year ended December 31, 2019.
- Exhibit 2: Excerpt of relevant pages from the Allstate Corporation Form 10-K for the fiscal year ended December 31, 2019.
- Exhibit 3: [Under Seal] Transcript of the AIC and ALIC 30(b)(6) Deposition of Thomas M. Klink taken September 24, 2019.
- Exhibit 4: Allstate Life Insurance Company Form 10-K for the fiscal year December 31, 2019, marked as Exhibit 1 to the Deposition of Brian Guntli taken November 13, 2020.
- Exhibit 5: [Under Seal] Transcript of the Deposition of Randolph Corradino taken June 13, 2017 in related litigation involving Jeffrey Stillwell, Case No. 15-cv-08251.
- Exhibit 6: [Under Seal] Transcript of the Deposition of Lee McElroy taken August 18, 2020.

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<sup>1</sup> Ameriprise Financial Services, Inc. is now known as Ameriprise Financial Services, LLC.

- Exhibit 7: Transcript of the Deposition of John Rugel taken October 7, 2020.
- Exhibit 8: FINRA BrokerCheck Report for Robert Brennan Dawson, produced in this litigation at AFSI00040349-57.
- Exhibit 9: FINRA BrokerCheck Report for Matt Vincent Fiamengo, produced in this litigation at AFSI00039881-89.
- Exhibit 10: FINRA BrokerCheck Report for Catherine Lynne Heath, produced in this litigation at AFSI00039811-20.
- Exhibit 11: FINRA BrokerCheck Report for Robert Soren Larsen, produced in this litigation at AFSI00040190-203.
- Exhibit 12: FINRA BrokerCheck Report for Lee Frederick McAllister, produced in this litigation at AFSI00040077-84.
- Exhibit 13: FINRA BrokerCheck Report for Jason Brice Meek, produced in this litigation at AFSI00039753-66.
- Exhibit 14: FINRA BrokerCheck Report for Robert Dale Olvera, produced in this litigation at AFSI00039909-21.
- Exhibit 15: FINRA BrokerCheck Report for Horacio Daniel Piccininno, produced in this litigation at AFSI00039767-76.
- Exhibit 16: FINRA BrokerCheck Report for Brent Allen Rupnow, produced in this litigation at AFSI00040339-48.
- Exhibit 17: FINRA BrokerCheck Report for Joel E. Salazar, produced in this litigation at AFSI00039834-48.
- Exhibit 18: FINRA BrokerCheck Report for Jeffrey Michael Stillwell, produced in this litigation at AFSI00040383-91.
- Exhibit 19: FINRA BrokerCheck Report for Scott Willard Taubman, produced in this litigation at AFSI00040371-82.
- Exhibit 20: FINRA BrokerCheck Report for Troy Michael Trahan, produced in this litigation at AFSI00040175-86.
- Exhibit 21: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement, produced in this litigation at AllstateAFS258615-628.

- Exhibit 22: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Robert Dawson, effective December 27, 2005. This document was produced in this litigation at AllstateAFS258724-732.
- Exhibit 23: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Matt Fiamengo, effective December 19, 2008. This document was produced in this litigation at AllstateAFS260327-328.
- Exhibit 24: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Catherine Dudley (Heath), effective March 1, 2012. This document was produced in this litigation at AFSI00003533-43.
- Exhibit 25: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Robert Larsen, effective December 1, 2007. This document was produced in this litigation at AllstateAFS190895-905.
- Exhibit 26: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Lee McAllister, effective December 1, 2010. This document was produced in this litigation at AllstateAFS258755-767
- Exhibit 27: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Jason Meek, effective August 1, 2014. This document was produced in this litigation at AllstateAFS258866-886.
- Exhibit 28: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Robert Olvera, effective December 1, 2014. This document was produced in this litigation at AFSI00004457-69.
- Exhibit 29: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Horacio Piccininno, effective June 1, 2011. This document was produced in this litigation at AllstateAFS258903-913.
- Exhibit 30: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Brent Rupnow, effective December 15, 2011. This document was produced in this litigation at AllstateAFS258944-954.
- Exhibit 31: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Joel Salazar, effective August 22, 2007. This document was produced in this litigation at AllstateAFS261079-096.
- Exhibit 32: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Jeff Stillwell, effective June 16, 2008. This document was produced in this litigation at AllstateAFS022468-477.

- Exhibit 33: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Scott Taubman, effective July 16, 2008. This document was produced in this litigation at AFSI00022043-55.
- Exhibit 34: Allstate L2000S Exclusive Financial Specialist Independent Contractor Agreement signed by Troy Trahan, effective March 16, 2009. This document was produced in this litigation at AFSI00020773-786.
- Exhibit 35: [Under Seal] EFS Supplement for the L2000 Agreement dated May 1, 2012, marked as Exhibit 5 to the Deposition of Thomas M. Klink taken September 24, 2019.
- Exhibit 36: [Under Seal] Relevant excerpts from the EFS Supplement for the L2000 Agreement dated December 30, 2014, marked as Exhibit 6 to the Deposition of Thomas M. Klink taken September 24, 2019.
- Exhibit 37: [Under Seal] Relevant excerpts from the EFS Supplement for the L2000 Agreement dated May 20, 2015, marked as Exhibit 7 to the Deposition of Thomas M. Klink taken September 24, 2019.
- Exhibit 38: [Under Seal] Relevant excerpts from the EFS Supplement for the L2000 Agreement dated June 10, 2016, marked as Exhibit 8 to the Deposition of Thomas M. Klink taken September 24, 2019.
- Exhibit 39: [Under Seal] Relevant excerpts from the EFS Supplement for the L2000 Agreement dated April 1, 2017, marked as Exhibit 9 to the Deposition of Thomas M. Klink taken September 24, 2019.
- Exhibit 40: [Under Seal] Relevant excerpts from the EFS Supplement for the L2000 Agreement dated September 17, 2015, marked as Exhibit 10 to the Deposition of Thomas M. Klink taken September 24, 2019.
- Exhibit 41: [Under Seal] Relevant excerpts from the EFS Supplement for the L2000 Agreement dated March 15, 2019, marked as Exhibit 11 to the Deposition of Thomas M. Klink taken September 24, 2019.
- Exhibit 42: Allstate Agency Standards, produced in this litigation at AllstateAFS260024-51.
- Exhibit 43: Exclusive Financial Specialist Independent Contractor Manual, produced in this litigation at AFSI00004389-426.
- Exhibit 44: Allstate Financial Services, LLC Registered Representative Agreement signed by Horacio Piccininno, produced in this litigation at AllstateAFS258982-92.

- Exhibit 45: Allstate Financial Services, LLC Registered Representative Agreement for Jeffrey Stillwell, produced in this litigation at AFSI00023870-80.
- Exhibit 46: Financial Specialist Employment Agreement (NY) signed by Stephen Caruso February 9, 2010, produced in this litigation at AllstateAFS258663-66.
- Exhibit 47: [Under Seal] Transcript of the 30(b)(6) Deposition of Anthony Albanese taken June 11, 2018 in the Allstate Life Insurance v. Larsen/Taubman matter.
- Exhibit 48: [Under Seal] Transcript of the Deposition of Brian Guntli taken November 13, 2020.
- Exhibit 49: [Under Seal] Transcript of the 30(b)(6) Deposition of Sean George taken July 8, 2020.
- Exhibit 50: [Under Seal] Transcript of the Deposition of Boston Cardinal taken August 26, 2020.
- Exhibit 51: [Under Seal] Email from Lee McAllister to Ameriprise with attached EFS Agreement and statements, produced in this litigation at AFSI00012052-58.
- Exhibit 52: Fax from Robert Dawson sending portion of EFS Manual, produced in this litigation at AFSI00002642-54.
- Exhibit 53: [Under Seal] Practice Analysis Forms marked as Exhibit 10 to the Deposition of Henry Schmidt taken March 13, 2020.
- Exhibit 54: [Under Seal] Transcript of the Deposition of Manish Dave taken August 28, 2020.
- Exhibit 55: [Under Seal] Transcript of the Deposition of Marcie Vinson taken July 14, 2020.
- Exhibit 56: [Under Seal] Transcript of the Deposition of Henry Schmidt taken March 13, 2020.
- Exhibit 57: [Under Seal] June 5, 2014 email from Robert Dawson to Ameriprise attaching statements, produced in this litigation at AFSI00028487-94.
- Exhibit 58: [Under Seal] June 4, 2014 email from Robert Dawson to Ameriprise attaching statements, produced in this litigation at AFSI00028824-37.

- Exhibit 59: [Under Seal] November 21, 2016 email from Robert Olvera to Ameriprise attaching Transaction Detail Reports, produced in this litigation at AFSI00029234-37.
- Exhibit 60: [Under Seal] August 27, 2015 email from Brent Rupnow to Ameriprise attaching commission statements, produced in this litigation at AFSI00030329-38.
- Exhibit 61: [Under Seal] August 28, 2015 email from Brent Rupnow to Ameriprise attaching financial documents, produced in this litigation at AFSI00030917-1051.
- Exhibit 62: August 12, 2016 email from Scott Taubman to Ameriprise attaching client list, produced in this litigation at AFSI00022769-74.
- Exhibit 63: [Under Seal] Transcript from the Deposition of Gary Gassmann taken May 16, 2018.
- Exhibit 64: Transcript from the Deposition of Deborah Smith taken March 15, 2018.
- Exhibit 65: [Under Seal] Executive Summary for Jeffrey Stillwell, marked as Exhibit 3 to the Deposition of Marcie Vinson taken July 14, 2020.
- Exhibit 66: [Under Seal] Executive Summary for Scott Taubman, marked as Exhibit 5 to the Deposition of Marcie Vinson taken July 14, 2020.
- Exhibit 67: [Under Seal] Executive Summary for Brent Rupnow, marked as Exhibit 9 to the Deposition of Marcie Vinson taken July 14, 2020.
- Exhibit 68: [Under Seal] Transcript from the 30(b)(6) Deposition of Chad Mostrom taken July 7, 2020.
- Exhibit 69: Transition Guide marked as Ex. 133 to the Deposition of Dean McGill taken May 23, 2018.
- Exhibit 70: [Under Seal] Transcript from the Deposition of Jeffrey Stillwell taken January 31, 2017.
- Exhibit 71: July 10, 2017 Declaration of Robert Olvera (filed in *Allstate Ins. Co. v. Olvera*, 2:17-cv-02276 (D. Kan.)) (AllstateAFS000069-71).
- Exhibit 72: [Under Seal] Declaration of Catherine Heath signed January 19, 2021.
- Exhibit 73: Declaration of Lee McAllister signed January 19, 2021.
- Exhibit 74: Declaration of Robert Olvera signed January 19, 2021.

- Exhibit 75: [Under Seal] Declaration of Horacio Piccininno signed January 20, 2021.
- Exhibit 76: Declaration of Brent Rupnow signed January 22, 2021.
- Exhibit 77: [Under Seal] January 5, 2017 email from Robert Olvera to Ameriprise attaching client list, produced in this litigation at AFSI00038730-31.
- Exhibit 78: [Under Seal] Declaration of Jeffrey Stillwell signed January 21, 2021.
- Exhibit 79: Declaration of Scott Taubman signed January 21, 2021.
- Exhibit 80: [Under Seal] Transcript from the Deposition of Robert Larsen taken June 15, 2018.
- Exhibit 81: [Under Seal] Client information filed in Case 15-cv-08251 December 7, 2018, marked as Exhibit 23 to the Deposition of Thomas Klink taken September 24, 2019.
- Exhibit 82: [Under Seal] Client information filed in Case 15-cv-08251 April 10, 2019, marked as Exhibit 24 to the Deposition of Thomas Klink taken September 24, 2019.
- Exhibit 83: [Under Seal] Client information filed in Case 15-cv-08251 May 18, 2016, marked as Exhibit 25 to the Deposition of Thomas Klink taken September 24, 2019.
- Exhibit 84: [Intentionally Omitted]
- Exhibit 85: Allstate client testimonials from 2018, marked as Exhibit 4 to the Deposition of Kim Greenwood taken August 27, 2020.
- Exhibit 86: Allstate client testimonials from 2020, produced in this litigation at AFSI00040392-98.
- Exhibit 87: [Under Seal] Declaration of John T. Sullivan signed January 21, 2021, with its "Attachment B."
- Exhibit 88: [Under Seal] True and correct PDF copy of Microsoft Excel spreadsheet produced in this litigation at AFSI00040404, referred to as "Attachment A" to the Declaration of John T. Sullivan.
- Exhibit 89: [Under Seal] Transcript from the 30(b)(6) Deposition of Michael Zolna taken July 16, 2020.

- Exhibit 90: [Under Seal] Email marked as Exhibit 6 to the Deposition of Brian Guntli taken November 13, 2020.
- Exhibit 91: FINRA BrokerCheck Report for Stephen John Caruso, produced in this litigation at AFSI00039793-810.
- Exhibit 92: [Under Seal] Ameriprise offer letter to Stephen Caruso dated October 3, 2011, produced in this litigation at AFSI00001843-47.
- Exhibit 93: [Under Seal] Ameriprise offer letter to Joel Salazar dated August 8, 2013, produced in this litigation at AFSI00006544-47.
- Exhibit 94: [Under Seal] Ameriprise offer letter to Robert Dawson dated June 12, 2014, produced in this litigation at AFSI00002522-25.
- Exhibit 95: Ameriprise Associate Advisor (AFA) Agreement signed by Matt Fiamengo August 27, 2015, produced in this litigation at AFSI00003692-99.
- Exhibit 96: [Under Seal] Ameriprise offer letter to Troy Trahan dated February 5, 2016, produced in this litigation at AFSI00009526-44.
- Exhibit 97: [Under Seal] Settlement Agreement and Release between Allstate and Scott Taubman and Robert Larsen, produced in this litigation at AllstateAFS259066-73.
- Exhibit 98: [Under Seal] Defendants' Amended Rule 26(a)(1) Disclosure Statement dated June 13, 2018, served in the Taubman Litigation.

Dated: January 22, 2021

DORSEY & WHITNEY LLP

By /s/ John T. Sullivan

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**Attorneys for Defendant**

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that on January 22, 2021, he caused a true and correct copy of the **Defendant's Appendix of Exhibits in Support of its Motion for Summary Judgment** to be filed electronically with the Clerk of Court using the CM/ECF system and to be served upon all parties via the Court's CM/ECF system.

/s/ John T. Sullivan

John T. Sullivan